

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:
EDWIN VELAZQUEZ BORGOS and
MARYFLOR RIVAS-VELAZQUEZ

Case No. 22-13002-mdc

EDWIN VELAZQUEZ BORGOS AND
MARYFLOR RIVAS-VELAZQUEZ,
Movant

Chapter 13

vs.

Nationstar Mortgage LLC,
Respondent

**RESPONSE TO MOTION TO SELL REAL PROPERTY FREE AND CLEAR OF
LIENS AND ENCUMBRANCES**

Nationstar Mortgage LLC, (herein, “Respondent”) by and through undersigned counsel, hereby responds to the Motion to Sell Real Property Free and Clear of Liens and Encumbrances [Doc. 25] filed on May 2, 2023 and in support thereof, shows unto the Court as follows:

1. Admitted
2. Admitted
3. Denied. By way of further answer, Respondent is without knowledge or information to admit or deny this allegation. Strict proof is demanded at trial.
4. Admitted.
5. Admitted

6. Denied. By way of further answer, Respondent is without knowledge or information to admit or deny the allegation in Paragraph 6. Strict proof is demanded at trial.

7. Admitted. By way of further answer, the Payoff is currently \$350,891.34 for the first mortgage.

8. Denied.

9. Denied. By way of further answer, Respondent is without knowledge or information to admit or deny the allegation in Paragraph 9. Strict proof is demanded at trial.

WHEREFORE, Respondent respectfully requests that this Honorable Court deny the Motion to Sell Real Property Free and Clear of Liens and Encumbrances and for any other relief the Court deems just and proper.

This the 9th day of May, 2023

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: EDWIN VELAZQUEZ BORGOS aka Edwin Velazquez AND MARYFLOR RIVAS-VELAZQUEZ aka Mary F. Velazquez	Case No. 22-13002-mdc
Nationstar Mortgage LLC, Movant vs. EDWIN VELAZQUEZ BORGOS aka Edwin Velazquez AND MARYFLOR RIVAS-VELAZQUEZ aka Mary F. Velazquez, Debtors	Chapter 13

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Motion to Sell Real Property Free and Clear of Liens and Encumbrances has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

BRAD J. SADEK, Debtor's Attorney
1500 JFK Boulevard
Suite 220
Philadelphia, PA 19102
brad@sadeklaw.com

KENNETH E WEST, Bankruptcy Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Office of United States Trustee, US Trustee
Robert N.C. Nix Federal Building
900 Market Street, Suite 320

Philadelphia, PA 19107

Via First Class Mail:

EDWIN VELAZQUEZ BORGOS
101 Osprey Way
Phoenixville, PA 19460

MARYFLOR RIVAS-VELAZQUEZ
101 Osprey Way
Phoenixville, PA 19460

Date: May 16, 2023

/s/Andrew Spivack

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